1 THE HONORABLE RICARDO S. MARTINEZ 2 3 4 5 6 UNITED STATES DISTRICT COURT 7 WESTERN DISTRICT OF WASHINGTON 8 AT SEATTLE 9 QUINTE HARRIS, an individual, Case No. 2:22-cv-00555-RSM 10 Plaintiff, STIPULATION AND ORDER 11 REGARDING DEADLINE TO v. RESPOND TO COMPLAINT 12 SKANSKA, BALFOUR BEATTY JV, MICROSOFT CORPORATION, and 13 BALFOUR BEATTY CONSTRUCTION, corporations 14 Defendants. 15 16 IT IS HEREBY STIPULATED and AGREED by and between Plaintiff Quinte Harris 17 ("Harris") and Defendants Skanska USA Building Inc. and Balfour Beatty Construction, LLC 18 (the "Construction Defendants") and Defendant Microsoft Corporation ("Microsoft") pursuant 19 to Federal Rule of Civil Procedure 6(b) and LCR 7(d)(1) that: 20 1. Defendants' time to respond to the Complaint filed on or about April 25, 2022, and 21 22 served on Defendants on or about June 30, 2022 ("Complaint") was extended by prior 23 stipulation from July 21, 2022 to August 16, 2022. 24 2. Defendants' time to respond to the Complaint is now extended to September 6, 2022. 25 3. Good cause exists for the agreed extension because Plaintiff requested additional time 26 to consider possible amendments to the Complaint, and extending the deadline for 27 STIPULATION TO EXTEND DEADLINE TO BRADLEY BERNSTEIN SANDS LLP

STIPULATION TO EXTEND DEADLINE TO RESPOND TO COMPLAINT - 1 Case No. 2:22-CV-00555

BRADLEY BERNSTEIN SANDS LLP 113 CHERRY ST. PMB 62056 SEATTLE, WA 98104-2205 206.337.6551 Defendants to respond to the Complaint will serve the cause of efficiency by providing Plaintiff with the opportunity to consider whether to amend his Complaint, and avoiding the need for Defendants to respond to a Complaint that may be mooted by Plaintiff's filing of an amended complaint.

4. The Court issued a Revised Order Regarding Initial Disclosures, Joint Status Report, and Early Settlement on July 21, 2022 [Dkt. 16] ("Revised Scheduling Order"), but parties respectfully request that the Court issue an additional revised Initial Scheduling Order further extending the deadlines in line with the new deadline to respond to the Complaint, as follows:

Deadline for FRCP 26(f) Conference: 9/22/22

Initial Disclosures Pursuant to FRCP 26(a)(1) 9/29/22

Combined Joint Status Report and Discovery Plan 10/6/22 As required by FRCP 26(f) and Local Civil Rule 26(f)

5. Aside from the Revised Scheduling Order addressed in paragraph 4, no other dates have yet been set in the case.

DATE: August 8, 2022.

## BRADLEY BERNSTEIN SANDS LLP

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| 1        | ORDER   |
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| 2        | Pursuant to the parties' stipulation, IT IS SO ORDERED.                             |
| 3        | Defendants should answer or otherwise respond to Plaintiff's Complaint on or before |
| 4        | September 6, 2022.  |
| 5        | The Court will enter a revised Initial Scheduling Order.                            |
| 6        |   |
| 7 8      | DATED this 10 <sup>th</sup> day of August, 2022.                                    |
| 9        |   |
| 10       |   |
| 11       | RICARDO S. MARTINEZ   |
| 12       | CHIEF UNITED STATES DISTRICT JUDGE  |
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| 1  | CERTIFICATE OF SERVICE   |
|--|--|
| 2  | I am a resident of the State of Washington, over the age of eighteen years, and not a party  |
| 3  | to above-entitled action. My business address is 113 Cherry St. PMB 62056, Seattle, WA 98104-  |
| 4  | 2205.  |
| 5  | I hereby certify, under penalty of perjury under the laws of the State of Washington, that   |
| 6  | on the 8th day of August, 2022, I filed the foregoing document with the Clerk of the Court via   |
| 7  | the CM/ECF system, which will give notice of such filing to the following:   |
| 8<br>9<br>10<br>11<br>11<br>12             | Attorneys for Plaintiff John Cochran, WSBA #38909 PACIFIC PROPERTY LAW LLC 1367 North Falcon Drive Ridgefield, WA 98642 Tel: (360) 601-8157 johnpplllc@gmail.com  Caroline Janzen, pro hac vice pending JANZEN LEGAL SERVICES LLC  |
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| 17<br>18<br>19<br>20<br>21                 | Attorneys for Skanska and Balfour Beatty Defendants Thomas P. Holt, WSBA #39722 Breanne F. Lynch, WSBA #55242 LITTLER MENDELSON, P.C. One Union Square 600 University Street, Suite 3200 Seattle, WA 98101.3122 Phone: 206.623.3300 tholt@littler.com blynch@littler.com |
| 23<br>24                                   | Executed on the 8 <sup>th</sup> day of August, 2022, at Seattle, Washington.   |
| 25   | /s/ Heidi B. Bradley<br>Heidi B. Bradley   |
| 26   | Heidi B. Bradley   |
| 27   |  |

STIPULATION TO EXTEND DEADLINE TO RESPOND TO COMPLAINT - 5 Case No. 2:22-CV-00555

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